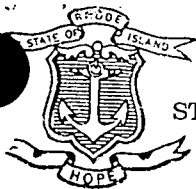


2.1



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

DIVISION OF AIR AND HAZARDOUS MATERIALS

291 Promenade Street

Providence, RI 02908-5767

22 January 1991

Russel Fish, Remedial Project Manager
Department of the Navy
Northern Division
Naval Facilities Engineering Command
Philadelphia, PA 19112-5094

Dear Mr. Fish:

The Division of Air and Hazardous Materials has conducted a review of the Quality Assurance Project Plans and the Health and Safety Project Plans prepared for the PCB removal and sampling activities to be conducted at NCBC Sites 12 and 14. Please find our comments to these plans attached.

If you have any questions regarding these comments, please contact me at 401-277-2797.

Sincerely,

Linda B. Wofford

Linda B. Wofford, Senior Engineer
Division of Air and Hazardous Materials

cc: Carol Keating, EPA Region I

Remedial Services for PCB's
Preconstruction Submittals
The International Companies
RIDEM Comments

1. Site Health and Safety Plan. Attachment III: Corporate Safety Plan. Personnel Protection Plan. "Our recommendations for all site activity are based on a review of existing conditions and expect Level D.

The Department recommends that Level C personnel protection with a full face respirator be utilized during the removal procedures. Furthermore the Department recommends that additional air monitoring be conducted at the sites in order to detect the presence of any volatilized PCB carrier compound.

NCBC RI/FS Work Plan
Health and Safety Plan - Addendum
TRC Environmental Consultants, Inc.
RIDEM Comments

1. Page 3, Section 4.5: Decontamination Procedures.

The addendum should specify the method of disposal which will be utilized for the decontamination fluids.

2. Page 4, Section 4.18.3 and Page 6, Section 4.19.3: Personal Protection.

The Department recommends that Level C personnel protection be utilized during the sampling procedures. Furthermore the Department recommends that air monitoring be conducted at the sites in order to detect the presence of any volatilized PCB carrier compound.

NCBC RI/FS Work Plan
Quality Assurance Project Plan - Addendum
TRC Environmental Consultants, Inc.
RIDEM Comments

1. Page 4, 1st Paragraph, Section 3.4: Project Scope. "The soil sample results will be used to confirm that any subgrade materials contaminated by the spills is cleaned up to 25 mg/kg PCBs by dry weight."

The State of Rhode Island has a 1 ppm PCB cleanup level policy. RIDEM will require that this clean up level be met for all material above or below grade.

2. Page 9, 5th Paragraph, Section 6.3.1: Trip Blanks. "Trip blanks will not accompany the containers and the samples collected during this phase of the project."

A trip blank should accompany the collected samples and be analyzed to detect the presence of any PCB carrier compound.

3. Page 12, 1st Paragraph, Section 9.0: Analytical Procedures. "The sample analyses will be performed in accordance with EPA Method 8080 for PCBs analysis (SW-846 Third Edition)."

Sample analyses should also be conducted for the PCB carrier compound.

4. Figure A-2: Site 14, Building 316 Sample Locations and Figure A-3: Site 12, Building 38 Sample Locations.

The figures should indicate the location of the PCB wipe samples.